

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SEKETHA WONZER and KEVIN DOZIER,

Case No. 1:20-cv-10836-JPC

Plaintiffs,

Judge John P. Cronan

-against-

DANIEL HERNANDEZ a/k/a Tekashi 6ix 9ine,

Defendants.
-----X

DECLARATION OF MATTHEW G. DeOREO

I, Matthew G. DeOreo, under the penalties of perjury laws of the United States pursuant to 28 U.S.C. § 1746, declare that the following is true and correct:

1. I am counsel for Plaintiffs and respectfully submit this Declaration in opposition to Defendant's Motion for an Independent Psychiatric Examination of Plaintiffs under Fed. R. Civ. P. 35.

2. In furtherance of this opposition, I respectfully submit the following Exhibits.

- a. **Exhibit A**: A true and complete copy of Docket No. 29, which is the June 22, 2021 Order of the Court;
- b. **Exhibit B**: A true and complete copy of Docket No. 39, which is a November 3, 2021 letter from Defendant's counsel to the Court;
- c. **Exhibit C**: A true and complete copy of the Court's November 3, 2021 minute order (Docket No. 40); and
- d. **Exhibit D**: A true and complete copy of a February 10, 2022 letter from Defendant's counsel to Plaintiff's counsel; and

- e. **Exhibit E**: A true and complete copy of a February 10, 2022 email chain between counsel.

3. Additionally, it should also be noted that Plaintiff did not fail to promptly respond to the alleged discovery deficiencies raised in Defendant's February 10, 2022 letter (Ex. D), as Defendant falsely claims in his Memorandum of Law (p.4). In response to this letter, Plaintiff's counsel emailed Defendant's counsel that he (Plaintiff's counsel) was available for a meet and confer call the following Tuesday, February 15, 2022 (Ex. E). Defendant's counsel never responded to that email concerning the meet and confer call.

Executed in New York, New York on 8th day of March 2022

/s/ Matthew G. DeOreo
Matthew G. DeOreo